

THE HONORABLE JAMES L. ROBART

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ANNA PATRICK, DOUGLAS MORRILL,
ROSEANNE MORRILL, LEISA
GARRETT, ROBERT NIXON,
SAMANTHA NIXON, DAVID
BOTTONFIELD, ROSEMARIE
BOTTONFIELD, TASHA RYAN,
ROGELIO VARGAS, MARILYN DEWEY,
PETER ROLLINS, RACHAEL ROLLINS,
KATRINA BENNY, SARA ERICKSON,
GREG LARSON, and JAMES KING,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

DAVID L. RAMSEY, III, individually;
HAPPY HOUR MEDIA GROUP, LLC, a
Washington limited liability company; THE
LAMPO GROUP, LLC, a Tennessee
limited liability company,

Defendants.

Case No. 2:23-cv-00630- JLR

**STIPULATION AND [PROPOSED] ORDER
REGARDING DEADLINES TO RESPOND
TO COMPLAINT AND RELATED
BRIEFING SCHEDULES**

Noted: July 6, 2023.

1 WHEREAS, Defendants David L. Ramsey III and The Lampo Group, LLC waived service
 2 of process on May 25, 2023, and Defendant Happy Hour Media Group, LLC waived service of
 3 process on July 6, 2023,

4 WHEREAS, under the Federal Rules of Civil Procedure, the current deadlines for
 5 Defendants to answer or otherwise respond to the Complaint are July 24, 2023, and August 14,
 6 2023, respectively,

7 WHEREAS, each of the Defendants anticipate that they will respond to the Complaint by
 8 filing motions to dismiss pursuant to Fed. R. Civ. P. 12, and

9 WHEREAS, the parties have met and conferred regarding the motions to dismiss and an
 10 appropriate briefing schedule.

11 THEREFORE, in order to provide a single, coordinated schedule for briefing Defendants'
 12 anticipated motions to dismiss, and to accommodate counsels' schedules on both sides, the parties
 13 have agreed to the following deadlines and ask that the Court enter an Order adopting them:

14 Date by which any motions to dismiss will be due: August 10, 2023

15 Date by which oppositions will be due: September 7, 2023

16 Date on which motions will be noted and reply briefs will be due: September 15, 2023

17 In addition to the above, one or more Defendants anticipate they will file a motion to stay
 18 discovery and to stay issuance of a case schedule pending the resolution of the motions to dismiss.
 19 The parties stipulate and agree that the motion to stay should be filed on August 10, 2023. The
 20 parties further agree that while any party may issue written discovery prior to August 10, no party
 21 shall be required to respond substantively to discovery until the Court resolves the motion to stay.
 22 This stipulation is without prejudice to any party's position regarding the merits of a stay.

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STIPULATED TO this 6th day of July, 2023.

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[PROPOSED] ORDER

IT IS SO ORDERED.

DATED this _____ day of _____, 2023.

The Honorable James L. Robart
United States District Judge